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Attorneys for Defendant
Mr. Garcia

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:23CR228-DJC
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) JUDGMENT AND SENTENCING
EDGAR ENRIQUE GARCIA-LOPEZ,) Date: March 6, 2025
) Time: 9:00 a.m.
) Judge: Hon. Daniel J. Calabretta
<u>Defendant.</u>)

IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Michele Beckwith, through Assistant United States Attorney Jason Hitt, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmoammadi, counsel for Defendant Edgar Enrique Garcia-Lopez, that the previously scheduled Judgment and Sentencing set for April 10, 2025 be continued to May 29, 2025 at 9:00 a.m.

The parties specifically stipulate as follows:

- On January 21, 2025, the Court continued Judgment and Sentencing at Mr. Garcia's request so that the government could extract data from his seized cellular phone (the phone was in the government's possession at the time, but no extraction had been completed) and allow him to review it for sentencing mitigation purposes. The government also agreed to produce ping data they

obtained pursuant to a search warrant. Mr. Garcia believes that the phone extraction and ping data may be relevant to formal PSR objections.

2. On March 4, 2025, the government informed Mr. Garcia that they completed the phone extraction but that the files were incomplete and only contained metadata. They contacted the case agent to obtain the complete files.
3. Formal objections were due March 27, 2025.
4. As of today, Mr. Garcia is awaiting production of the complete phone extraction and ping data. The case is also in the process of being reassigned to a new AUSA.
5. For the forgoing reasons, Mr. Garcia requires additional time to receive and review the phone extraction and ping data prior to timely filing formal PSR objections. Good cause and compelling circumstances exist to continue the Judgment and Sentencing.
6. The government does not object to Mr. Garcia's continuance request.
7. The parties jointly request that the Judgment and Sentencing Schedule be modified as follows.

Draft PSR	completed
Informal Objections	completed
Final PSR	completed
Formal Objections	May 15, 2025
Response to Formal Objections/Sentencing Memorandum	May 22, 2025
Judgment and Sentencing	May 29, 2025

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Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: April 2, 2025

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Defendant
Mr. Garcia

Date: April 2, 2025

MICHELE BECKWITH
Acting United States Attorney

/s/ Jason Hitt
JASON HITT
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: April 4, 2025

/s/ Daniel J. Calabretta

THE HONORABLE DANIEL J. CALABRETTA
UNITED STATES DISTRICT JUDGE